

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DANIEL GRAND, ) CASE NO.: 1:22-CV-01594  
Plaintiff, )  
vs. ) JUDGE: BRIDGET MEEHAN BRENNAN  
CITY OF UNIVERSITY HEIGHTS, )  
OHIO, et al., ) **MOTION FOR ENLARGEMENT OF**  
Defendants ) **TIME WITHIN WHICH TO MOVE OR**  
 ) **PLEAD TO PLAINTIFF'S FIRST**  
 ) **AMENDED COMPLAINT**  
 )

Now come Defendants, City of University Heights and Michael Dylan Brennan by and through counsel Mazanec, Raskin & Ryder Co., L.P.A., and hereby move this Honorable Court pursuant to Fed.R.Civ.P. 6(b) for an enlargement of time through and including the answer date to be established for New Party Defendants Luke McConville, Paul Siemborski, April Urban, Michael Fine, Stephanie Scalise, and Geoff Englebrecht within which to move, plead, or otherwise respond to Plaintiff's First Amended Complaint. The reason for this request is that the First Amended Complaint makes wide-ranging and detailed allegations of fact, many of which are new, against both the existing Defendants and the New Party Defendants. The New Party Defendants listed above will be represented, along with the University Heights and Mayor Brennan, by the undersigned and are in the process of providing waivers of service to Plaintiff's counsel which will entail an answer date that is after the present answer date for University Heights and Mayor Brennan. Rather than filing two separate Answers: one on behalf of the originally named Defendants and a second on behalf of the newly named Defendants, Defendants seek to file only one Answer.

Defendants have previously been granted no enlargements of time to respond to Plaintiff's First Amended Complaint, for a total of – 0 – days and, by way of the attached affidavit, certify that this motion is not interposed for purposes of harassment or delay. Plaintiff's counsel does not oppose this extension.

In view of the foregoing, Defendants, City of University Heights and Michael Dylan Brennan respectfully request that this Honorable Court grant them an extension of time through and including the answer date to be established for New Party Defendants Luke McConville, Paul Siemborski, April Urban, Michael Fine, Stephanie Scalise, and Geoff Englebrecht within which to move, plead, or otherwise respond to Plaintiff's First Amended Complaint.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/ Amy K. Herman

---

JAMES A. CLIMER (0001532)  
STEVEN K. KELLEY (0023747)  
FRANK H. SCIALDONE (0075179)  
AMY K. HERMAN (0092204)  
100 Franklin's Row  
34305 Solon Road  
Cleveland, OH 44139  
(440) 248-7906  
(440) 248-8861 – Fax  
Email: jclimer@mrrlaw.com  
skelley@mrrlaw.com  
fscialdone@mrrlaw.com  
aherman@mrrlaw.com

*Counsel for Defendants City of University Heights,  
Michael Dylan Brennan, Luke McConville, Paul  
Siemborski, April Urban, Michael Fine, Stephanie  
Scalise, and Geoff Englebrecht*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2023, a copy of the foregoing Motion for Enlargement of Time Within Which to Move or Plead to Plaintiff's First Amended Complaint was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Notice has also been sent by depositing same in first-class United States mail, postage prepaid, to the following:

Christopher Cooney  
2319 Miramar Blvd.  
University Heights, OH 44118  
*Defendant*

Jack S. Kluznik  
2308 Loyola Road  
University Heights, OH 44118  
*Defendant*

s/ Amy K. Herman

---

JAMES A. CLIMER (0001532)  
STEVEN K. KELLEY (0023747)  
FRANK H. SCIALDONE (0075179)  
AMY K. HERMAN (0092204)

*Counsel for Defendants City of University Heights,  
Michael Dylan Brennan, Luke McConville, Paul  
Siemborski, April Urban, Michael Fine, Stephanie  
Scalise, and Geoff Englebrecht*